

UNITED STATES BANKRUPTCY COURT  
WESTERN DISTRICT OF NORTH CAROLINA  
CHARLOTTE DIVISION

In re:

VR KING CONSTRUCTION,  
LLC,

Debtor.

Case No.: 18-31635

Chapter 11

MOTION TO SUBSITUTE COUNSEL

1. NOW COMES DEBTOR by and through attorney, Robert Lewis, Jr., and moves to substitute Robert Lewis, Jr., as the attorney of record in this Bankruptcy proceeding. In support hereof, Debtor shows unto the Court.
2. The Debtor filed a voluntary petition for relief under chapter 11 of the United States Bankruptcy Code in this Court on October 31, 2018 (the "Petition Date").
3. Debtor's original attorney and present attorney of record is John C. Woodman of the North Carolina Bar No. 42365
4. Debtor desires to release and discharge Mr. Woodman as his attorney of record going forward; and in substitution thereof, Debtor desires to employ the legal services of attorney, Robert Lewis, Jr., to be henceforth her attorney of record in this bankruptcy proceeding.
5. The undersigned is informed and believes that Debtor has communicated with Mr. Woodman its intention to change legal counsel as above set-forth.
6. Attorney Robert Lewis, Jr., is a licensed practicing attorney, admitted to and engaged in the practice of law in this Court; he represents no interests in conflict with the interests of Debtor, either in this proceeding or generally.

WHEREFORE, DEBTOR PRAYS THE COURT:

1. Authorize and approve the substitution of legal counsel in this bankruptcy proceeding; and in connection therewith;
2. Excuse Attorney John C. Woodman from further duties as counsel of record for Debtor herein; and
3. Authorize Attorney Robert Lewis, Jr., to assume the responsibilities as his legal counsel of record and for such other and further relief as to the Court may seem just and proper.

This 2<sup>nd</sup> day of March, 2019.

/s/ Robert Lewis, Jr. (NC Bar No. 35806)  
The Lewis Law Firm, P.A.

434 Fayetteville Street, Suite 2330  
Raleigh, NC 27601  
Phone: (919) 719-3906  
Fax: (919) 573-9161  
Email: [rlewis@thelewislawfirm.com](mailto:rlewis@thelewislawfirm.com)

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NOTICE OF OPPORTUNITY FOR HEARING  
(Response required if opposed and hearing sought)

NOTICE OF OPPORTUNITY FOR HEARING  
(Response required if opposed and hearing sought)

TAKE NOTICE that Debtor(s) have filed papers with the Court to substitute counsel. A copy of these papers is included with this Notice.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. If you do not have an attorney, you may wish to consult one.

If you do not want the Court to order the substitution of counsel, or if you want the Court to consider your views on the motion, then on or before March 5, 2019 you or your attorney must do three (3) things:

File with the Court a written response requesting that the Court hold a hearing and explaining your position. File the response at:

U.S. Bankruptcy Court 401 W. Trade Street Charlotte, NC 28202

If you mail your request to the Court for tiling, you must mail it early enough so that the Court will receive it on or before the date stated above.

On or before the date stated above for written responses, you must also mail or fax a copy of your written request to:

Robert Lewis, Jr  
PO Box 1446  
Raleigh, NC 27602

Attend the hearing scheduled for: March 5, 2019 at the United States Bankruptcy Court, 40 I W. Trade Street, Courtroom# 1-5, Charlotte, North Carolina 28202.

If you or your attorney do not take these s teps, A HEARING WILL NOT BE HELD, and the Court may decide that you do not oppose the relief sought in the motion or objection and may enter an order granting that relief.

This 2<sup>nd</sup> day of March, 2019.

/s/ Robert Lewis, Jr. (NC Bar No. 35806)  
The Lewis Law Firm, P.A.

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The undersigned certifies that on the 2<sup>nd</sup> day of March, 2019, she served a copy of the foregoing: MOTION TO SUBSTITUTE LEGAL COUNSEL and NOTICE OF OPPORTUNITY FOR HEARING:

by placing said copy in a postpaid envelope addressed to the person(s) hereinafter named, at the place address below, which is the last known address, and by depositing said envelope and its contents in the United States Mail:

Bankruptcy Administrator (via ECF)

John C. Woodman (sent via electronic filing)  
211 East Blvd.  
Charlotte, North Carolina 28203

Vinroy W. Reid (sent via electronic filing)  
PO Box 5035  
Charlotte, North Carolina 28229

ALL CREDITORS ON MATRIX

This 2<sup>nd</sup> day of March, 2019.

/s/ Robert Lewis, Jr. (NC Bar No. 35806)  
The Lewis Law Firm, P.A.

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